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August 31, 2015

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VIA ECF

Hon. Steven C. Mannion
United States Magistrate Judge for the District of New Jersey
Martin Luther King Building & U.S. Courthouse
50 Walnut Street, Court Room MLK 5C
Newark, New Jersey 07101

Re: *Trzaska v. L’Oreal USA, Inc., et al.*, Civil Action No. 15-2713 (SDW) (SCM)

Dear Magistrate Judge Mannion:

We represent defendant L’Oreal, S.A. in the above matter.

On August 14, 2015, we filed a motion (Dkt. No. 30) seeking to dismiss the Complaint and the First Amended Complaint as to L’Oreal, S.A. and for a stay of time in which L’Oreal, S.A. may move to dismiss the pleadings for lack of personal jurisdiction. The motion was made returnable on September 8, 2015 and according to the Court’s Local Rules, answering papers were required to be filed on or before August 25, 2015.

Plaintiff did not file any opposition by that deadline, did not obtain or seek our consent to a late filing, and to our knowledge, did not receive or request any extension of that deadline from the Court. Instead, on August 27, 2015, two days after the filing deadline, plaintiff filed a brief in opposition to the motion. As far as we are aware, there was no request for permission to make a late filing *nunc pro tunc*.

Per my conversation of Friday, August 28, 2015 with Your Honor’s Chambers, our understanding of Local Rule 7.1 is that the filing of opposition papers after the due date has the effect of adjourning the motion one cycle, specifically to September 22, 2015, with our reply papers now being due on September 15, 2015. We will submit our papers on or before that date.

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We remain available for any conferences or questions that Your Honor may deem necessary.

Respectfully yours,



Eric A. Savage

cc: Hon. Susan D. Wigenton, U.S.D.J.

Gerard J. Jackson, Esq.

Christopher B. Carton, Esq.